

EXHIBIT A

Exhibit A
Summary of U.S.C§ 102(b) Combinations Proposed by Defendants

References to Combine	Expert	Basis	Citation
NSM 1990 DIDS Feb. 1991 DIDS Oct. 1991	Mr. Heberlein	Incorporation by Reference Note: Dr. Staniford does not agree, opining instead that it would be obvious to combine NSM 1990 with DIDS Oct. 1991. See Staniford Report at pg. 72	Heberlein Report at ¶152; Ex. C
DIDS Feb. 1991 DIDS Oct. 1991	Mr. Heberlein	No Basis Provided	Heberlein Tr. Vol. I at pg.120:1-121:25
ISM 1992 DIDS Oct. 1991	Mr. Heberlein	Incorporation by reference Note: Dr. Staniford does not agree, opining instead that it would be obvious to combine NSM 1990 with DIDS Oct. 1991. See Staniford Report at pg. 72	Heberlein Report, Ex. E
ISM 1992 NSM 1990 NSM 1991 DIDS Feb. 1991 DIDS Oct. 1991	Mr. Heberlein	ISM makes "explicit direction to use DIDS"	Heberlein Report at ¶ 177
GrIDS 1996 GrIDS 1997	Mr. Heberlein	No Basis Provided	Heberlein Report at ¶ 209; Ex. F Heberlein Tr. Vol. I at pg.148:5-149:3
Ji-Nao Report Ji-Nao Slides	Mr. Heberlein	No Basis Provided	Heberlein Report at ¶ 215; Ex. G
Emerald 1997 NIDES 1994 Intrusive Activity 1991	Mr. Heberlein	Emerald makes "explicit references" to NIDES 1994 and Intrusive Activity 1991	Heberlein Report, ¶ 264; Ex. U

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References to Combine	Expert	Basis	Citation
HP OpenView RFC 1155 RFC 1157 RFC 1213 RFC 1271	Mr. Heberlein	Incorporation by reference	Heberlein Report at ¶316; Ex M.
HP OpenView NetStalker	Mr. Heberlein	Both on sale prior to November 9, 1997, and could work together through SNMP traps	Heberlein Report at ¶ 328

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